

UNITED STATES DISTRICT COURT

for the

Western District of Texas

United States of America

v.

Case No.

W24-144M

PATRICK TREVOR WHITE

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 2, 2024 in the county of McLennan in the
Western District of Texas, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. 875(c)

knowingly and willfully did transmit in interstate and foreign commerce, a communication, to-wit: a cellular phone call, and the communication contained a threat to injure the person of another, in violation of Title 18, United States Code, Section 875(c)

This criminal complaint is based on these facts:

See attached Affidavit

☒ Continued on the attached sheet.

Complainant's signature

MICHAEL ELKHEIR, SA-Dept of Transportation

Printed name and title

Sworn to before me and signed in my presence.

Date: 7/11/2024

*Judge's signature*City and state: Waco, Texas

DEREK T. GILLILAND, US Magistrate Judge

Printed name and title

SEALED**W24-144M**

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Michael Elkheir, being duly sworn under oath, do hereby depose and state:

AGENT BACKGROUND

1. I am a Special Agent (SA) with the US Department of Transportation, Office Inspector General (DOT-OIG), assigned to the Fort Worth, TX office since February 2024. As such, I am trained as a federal law enforcement officer responsible for conducting criminal investigations of alleged violations of federal law, with a focus on cases having a nexus to Department of Transportation programs. My duties as a DOT-OIG Special Agent include investigating offenses related to public corruption, bribery, fraud, product substitution, threats, among others. Prior to DOT, I worked as a Special Agent within the Department of Defense since August 2013. Prior to being employed in the DoD, I served as a police officer in the city of Washington, District of Columbia, for approximately two and one-half years and then as a Deportation Officer for the United States Immigration & Customs Enforcement (ICE), Enforcement & Removal Operations for approximately four and one-half years. In these positions, I participated in numerous criminal investigations, involving violations of local, state, and federal laws. I have also served as a Task Force Officer assigned to the FBI's Joint Terrorism Task Force. I have received training on and have also participated in investigations in which computers and other electronic media are used as the means for criminal activity.

I make this affidavit in support of a criminal complaint and application for an arrest warrant charging PATRICK TREVOR WHITE (hereinafter refer to as SUBJECT) with 18 U.S.C. § 875(c) (Interstate communications).

3. The facts and information contained in this affidavit are based on my personal

knowledge and observations, information conveyed to me by other law enforcement officials, and my review of records, documents, and other physical evidence obtained during this investigation. As detailed below, I have probable cause to believe that SUBJECT has violated federal law, including violations of 18 U.S.C. § 875 (c) (Interstate Communications) This affidavit contains information necessary to support probable cause but is not intended to include each and every fact and matter observed by me or known to the government.

FACTS IN SUPPORT OF PROBABLE CAUSE

4. In or about July 2, 2024, the United States Department of Department of Transportation, Office of Inspector General (DOT-OIG) (DoD), received a referral from the Federal Aviation Administration (FAA) Law Enforcement Assistance Program (LEAP) regarding information in connection with SUBJECT making threats to the Director of Operations (hereinafter refer to as VICTIM) of an employer in which SUBJECT was in the hiring process for before the offer was rescinded due to a failed alcohol breathe test for a pilot job. At all times relevant to this affidavit, SUBJECT resided in Waco, Texas, within the Western District of Texas.

5. On July 10, 2024, I spoke with the VICTIM regarding his/her relationship with the SUBJECT. VICTIM stated that on February 6, 2024, SUBJECT was interviewed for the Chief Pilot position with a flight department in Florida. On February 26, 2024, SUBJECT received a tentative employment offer and contract. In that contract, SUBJECT was notified of a pre-employment medical and that he must successfully pass an alcohol and drug screening per federal regulation. SUBJECT acknowledged receipt of that contract.

6. On March 5, 2024, SUBJECT conducted his pre-employment screening and tested with a blood alcohol content of .04, which was in violation of FAA regulations. Due to the violation, SUBJECT received an email on March 14, 2024 rescinding his offer of employment. Subsequent to

receiving that email, SUBJECT continuously called VICTIM via cell phone number ***-***-7528, harassing VICTIM and making disparaging remarks about the incident. After approximately five days of harassing phone calls, SUBJECT stopped calling.

7. VICTIM stated that on June 28, 2024, SUBJECT reinitiates contact with him via cellular phone. On June 29, 2024, SUBJECT leaves a voicemail on VICTIM's phone stating "I hope you like the smell of bbq" and "I love the street you live on". VICTIM at that moment took that as veiled threats to his safety.

8. Shortly after the voicemails, SUBJECT begins to send threatening text messages, below are a sample:

"I hope your day is going well. I want to come visit you soon I can't wait."

"Good morning I'm gonna contact you every day for the rest of my life but I have to ask what is your reasoning even my medical doctor said this is obviously a very small person intellectually and spiritually"

"Good evening Curtis I just thought I'd say hi. Hope your day was special. I'll talk to you tonight at midnight."

"Oh, by the way, do you like barbecue?"

"Oh by the way, I love the street you live on"

"Good morning cocksucker" "Rumor has it that you're gay at United? I guess I'll have to post that on Facebook."

"I had an epiphany a vision if you will someone that you love is it going to die in the next 14 days its not in my will nor will it be from my hand, but it is going to happen. I would start praying if I was you."

"I need you to retract all those statements to the FAA and just say I miss spoke because you did Or this is going to get really ugly come tomorrow."

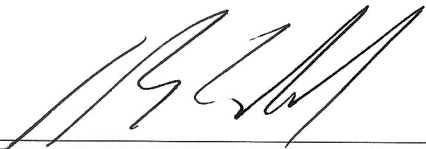
9. While also speaking with the VICTIM, he/she stated that he/she believes that SUBJECT re-initiated communication because he attempted to renew his FAA airman medical and was notified he was unable to do so because of the pending violation. This would render SUBJECT unable to fly an aircraft legally.

10. On July 2, 2024, SUBJECT left a voicemail on VICTIM's phone stating " I'm coming after you you mother fucker, you know what I'm being evicted from my place residence because of your ass and your actions. I'm gunna come after you you piece of shit and I'm going to knock on your door and I'm going to fucking kill ok get it call the fucking cops I don't give a shit. I'm going to fucking kill you, I'm going to kill you ass you hear me. You little piece of shit I'm going to fucking kill you. Know its real cause its coming you piece of shit"

11. After that voicemail, SUBJECT has left more voicemails harassing and threatening VICTIM. Since receiving those threats, VICTIM has reported all of these to the FAA as well as the Jacksonville, Fl Sheriffs Office. VICTIM is in fear for his/her life and that the SUBJECT may travel to Florida to cause him/her harm. During the entire time the threats were made, SUBJECT, who lives in Waco, Texas, made threats via his cellular phone to VICTIM who has been living in the state of Florida the entire time.


CONCLUSION

Based on the foregoing, your affiant respectfully submits that there is probable cause to believe that SUBJECT has committed violations of 18 U.S.C. § 875(c) (Interstate communications). In consideration of the foregoing, your affiant respectfully requests that this Court issue an arrest warrant for SUBJECT.



MICHAEL ELKHEIR, Special Agent
Department of Transportation
Office of Inspector General

SWORN TO AND SUBSCRIBED before me on the 11 day of July, 2024.



DEREK T. GILLILAND
United States Magistrate Judge